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**From:** Topinka, Natalie [topinka.natalie@epa.gov]  
**Sent:** 2/13/2018 8:29:31 PM  
**To:** Nam, Ed [nam.ed@epa.gov]  
**CC:** Breneman, Sara [breneman.sara@epa.gov]  
**Subject:** FW: Request to expedite FAR (Technical Package) - SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"  
**Attachments:** NSPS OOOOa Technical expedited FAR waiver Region 5.pdf

**Importance:** High

Ed,

See below regarding the request to expedite Final Agency Review (FAR) for the Technical portion of the NSPS OOOOa (Oil and Natural Gas) reconsideration. FAR is the last opportunity in the rulemaking process for internal EPA review of an action.

The workgroup chair proposed a 5-day review period due to an accelerated schedule of this rulemaking. However, EPA's Action Development Process (ADP) guidance\* specifies a minimum of 15 working days for review except in rare cases where exceptional circumstances such as a court-ordered deadline exist. This rulemaking timeline is not under a court-ordered deadline – the proposed accelerated schedule is internal.

This rulemaking has been on an extremely expedited timeline to date and therefore opportunities for discussion and review have already been truncated. In order to adequately review the final materials, prepare comments and recommendations, and schedule and conduct a briefing for Cathy if she requests it, I recommend agreeing to a 10-day review period, provided the workgroup has the necessary materials in hand to review at the beginning of the period.

Previous waiver forms have gone out under your signature. If you concur, I can send this to the workgroup chair. Deadline for me to do so is COB Wednesday 2/14.

\*ADP guidance: <http://intranet.epa.gov/actiondp/documents/adp09-24-15.pdf>

Thanks,

Natalie

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Natalie M. Topinka  
Environmental Scientist  
U.S. Environmental Protection Agency, Region 5  
Air Enforcement and Compliance Assurance Branch  
77 West Jackson Boulevard (AE-18J)  
Chicago, IL 60604  
ph: (312) 886-3853  
fax: (312) 692-2410

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**From:** Thompson, Lisa  
**Sent:** Tuesday, February 06, 2018 5:34 PM  
**To:** Mia, Marcia <Mia.Marcia@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Durkee, Stanley <Durkee.Stan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>

**Cc:** Hoffman, Howard <hoffman.howard@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>; DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mills, Kathy <Mills.Kathy@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Zenick, Elliott <Zenick.Elliott@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Culligan, Kevin <Culligan.Kevin@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Eisele, Adam <Eisele.Adam@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Chan, Elizabeth <Chan.Elizabeth@epa.gov>

**Subject:** Request to expedite FAR (Technical Package) - SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"

**Importance:** High

All,

Due to the accelerated schedule of this rulemaking and the desire to keep the process moving ahead, we're requesting an expedited Final Agency Review of 5 days. We anticipate that the FAR meeting would be held during the last week of February, so you can expect a FAR package (Action Memorandum, Federal Register documents, economic analysis, etc) the week of February 19<sup>th</sup>, allowing for a 5 day review period (not including the day you receive the package, or the day of the FAR meeting). We're requesting that you submit an expedited milestone request by COB 2/14.

Prior to FAR, we also plan to send sections of the preamble and regulatory text to the workgroup, as they are available. We hope that sharing portions of the rule early will help streamline your review during FAR, and that early feedback can be received from the workgroup as we develop the proposal.

Title: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration  
SAN: 5719.8

Request: Expedite

Milestone: Final Agency Review

Stage: Proposal

Suggested rationale: The EPA is working on an expedited schedule to propose the rule titled, "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration", Tier 2, 5719.8. This action is a reconsideration of subpart OOOOa and will propose focused options and alternatives on specific topics which EPA has granted reconsideration on and identify opportunities to streamline implementation and improve cost-effectiveness of compliance. Due to the accelerated schedule of this rulemaking, we are requesting a 5 day FAR review.

Please submit the expedited milestone request by COB 2/14.

[http://intranet.epa.gov/adplibrary/documents/workgrouppollform\\_2015-10-19.pdf](http://intranet.epa.gov/adplibrary/documents/workgrouppollform_2015-10-19.pdf)

Thanks,  
Lisa

Lisa Thompson  
Fuels and Incineration Group  
Office of Air Quality Planning and Standards  
U.S. Environmental Protection Agency  
919-541-9775